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MEMO ENDORSED

*Fact discovery is extended to
April 9, 2020. The conference is
adjourned to April 23, 2020
at 10:00 A.M.*

February 10, 2020

Via ECF

Honorable Judge Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square, Courtroom 705
New York, New York 10007

SO ORDERED:

Paul G. Gardephe
Paul G. Gardephe, U.S.D.J.

Re: Caliesta Vernon v. Jordache Enterprises, Inc., et al. *Feb. 11, 2020*
Index No.: 1:19-cv-05421-PGG

Dear Judge Gardephe:

We represent the Plaintiff in the above-referenced matter. We write Your Honor, jointly with counsels for Defendants, to respectfully request an adjournment of the parties' status conference, presently scheduled for February 13, 2020, and a 45-day extension of the parties' fact discovery deadline, presently scheduled for February 24, 2020.

The parties jointly make this request because we are still in the process of exchanging paper discovery. Plaintiff served her Interrogatories and Requests for Production on December 12, 2019. Plaintiff received Defendants' responses at the end of last week. On January 12, 2020, Defendants served their own Interrogatories and Requests for Production. Therefore, Plaintiff's own responses will not be due until the end of this week. While the parties intend to work diligently to resolve any anticipated discovery issues without the need for judicial intervention, we are seeking a 45-day extension of the parties' fact discovery deadline in order to complete paper discovery and schedule (and take) depositions.

Therefore, in order to conserve judicial time and resources, the parties are respectfully requesting an adjournment of the parties' February 13, 2020 Status Conference, and an extension of the parties' fact discovery deadline to April 20, 2020. This is the parties' first joint request for an adjournment of the parties' Status Conference and the fact discovery deadline.

We thank Your Honor for Your attention to this matter.

Respectfully submitted,

PHILLIPS & ASSOCIATES, PLLC

/s/ Silvia C. Stanciu, Esq.
Silvia C. Stanciu, Esq.

cc: Lindsey Blackwell, Benjamin Levine, Mercedes Colwin, *Attorneys for Defendants* (Via ECF)